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ATTORNEYS FOR WC INDEPENDENCE CENTER LLC
AND WC MRP BELLEVILLE CENTER, LLC

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION

IN RE:	§	
	§	CHAPTER 11
SEARS HOLDINGS CORPORATION,	§	
et al.	§	CASE NO. 18-23538-rdd
	§	(Jointly Administered)
DEBTORS	§	
.		

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE
AND SERVICE OF ALL OTHER PAPERS

PLEASE TAKE NOTICE that the undersigned counsel hereby enters its appearance on behalf of WC Independence Center LLC (“WC Independence”) and WC MRP Belleville Center, LLP (“WC Belleville”), creditors and parties-in-interest in the above-referenced chapter 11 bankruptcy case (the “Bankruptcy Case”), pursuant to the United States bankruptcy code and federal rule of bankruptcy procedure 9010.

PLEASE TAKE FURTHER NOTICE that, pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017, 9007, and 9010, the undersigned hereby requests that all notices given or required to be given in the Bankruptcy Case including, but not limited to, all papers filed and served in all adversary proceedings in the Bankruptcy Case, and all notices mailed only to statutory committees or their authorized agents or to creditors and equity security holders who file with the court a request that all notices be mailed to them, be given to and served at the following address, telephone and fax number:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Federal Rule of Bankruptcy Procedure 2002, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand-delivery, telephone, fax transmission, or otherwise filed in or made with regard to this case and any proceeding commenced herein.

PLEASE TAKE FURTHER NOTICE that the foregoing simply constitutes a demand and request for service of papers and does not constitute consent to the jurisdiction of the Bankruptcy Court or a waiver of the right to a jury trial. Further, this request for notice does not waive the Creditors':

- a) Right to have any and all final orders for any and all non-core matters entered only after a *de novo* review by a United States District Court;
- b) Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation of such matters as "core proceedings" pursuant to 28 U.S.C. § 157 and whether such jury trial right is pursuant to statute or the United States Constitution;
- c) Right to have the reference of any matter withdrawn by the United States District Court in any manner or proceeding subject to mandatory or discretionary withdrawal; and
- d) Other rights, claims, actions, setoffs, recoupments, or other matters to which the Creditors are entitled under any agreements or at law or in equity or under the United States Constitution.

All of the above-rights are expressly reserved and preserved by the Creditors without exception and shall not be waived, confessed, or conceded by filing this notice or by any other participation in this matter.

Dated: October 23, 2018

By: /s/ Lynn H. Butler

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ATTORNEYS FOR WC INDEPENDENCE
CENTER LLC AND WC MRP BELLEVILLE
CENTER, LLC.

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of October 2018, a true and correct copy of the foregoing was served via the Court's ECF system to the parties registered to receive electronic service.

/s/ Lynn H. Butler

Lynn H. Butler